OPERATING INSTRUCTION

Processing Electronic Cabinets or Other Potential PCB Equipment

RESPONSIBILITY	STEP	ACTION
		In addition to electronic cabinets, this SOP is applicable to fluorescent light ballasts and other potential PCB equipment/ scrap.
Material Sorter and Classifier	1	Prior to receipt of electronic scrap, all material will be visually inspected for evidence of leakage/spillage or saturation with liquids (oils or fluids), either originating from inside the unit or from other units. ***NOTE***: Any unknown liquid will be considered PCB until known to be otherwise. It is assumed that all hermetically sealed capacitors, transformers, rectifiers, etc., contain in excess of the minimum acceptable levels of PCBs concentrations applicable for that State. Skin contact with PCB liquid should be avoided regardless of PPM levels.
	2	If equipment is contaminated with free liquids assumed to contain PCB, reject the item(s) on DRMS Form 917, Property Disposal Reject/Advice. Check block "Lab Analysis Required for PCBs". If equipment is discovered to be leaking or contaminated with free liquids after receipt or upon downgrade to scrap, notify the Store Manager, Environmental Protection Specialist, or Environmental Monitor, as appropriate. If equipment is not contaminated or leaking, go to Step 12.
Environmentally Trained Personnel	3	Determine the extent of contamination.
	4	Contact the Safety and Health Division (DRMS-DDH) or an DRMS Environmental Protection Specialist to determine handling and PPE requirements.

	5	Inform the Host Spill Response Coordinator if a cleanup is required.
	6	In conjunction with receiving personnel, segregate units suspected of being contaminated by or leaking PCB from other scrap generations. Do not commingle.
	7	Palletize and store in a drip pan or in compliant storage until the PCB components can be removed.
	8	Tag or label "PCB" (see Enclosure 5).
	9	If contamination is contained; i.e., confined to a limited area with little chance of spreading if handled properly, place the material in a removable--head 30, 55, or 85 gallon drum as outlined in 40 CFR 761.45(c)(6). The drum should already have been placed into a sealed drip pan or in other compliant storage.
	10	Label the drum with a PCB label as described in 40 CFR 761.40. Mark the drum with the date of the first item being placed into it.
	11	Notify the Store Manager to ensure removal of the drum.
Material Sorter and Classifier or other personnel.	12	All electronics potentially contain PCB components. These components/subcomponents require removal in conjunction with sorting/segregating of precious metals bearing material or, prior to sale, if material contains no precious metals. Coordinate with the Environmental Protection Specialist or Environmental Monitor if in doubt of presence of PCB components. ***NOTE***: Guidance as to when electronic equipment shall be dismantled for precious metal recovery is found in DRMS-I 4160.14, Volume VIII.
	13	Remove all electronic subcomponents suspected of containing PCBs; e.g., hermetically sealed transformers, capacitors, rectifiers, etc., from the primary structure and place into containers. This is done by detachment of the lugs of subcomponents to prevent damage to insulators of transformers, capacitors, etc. Damage to transformer insulators results in breaking the hermetic seal, deteriorates the integrity of the item, and may cause leaks.

		NOTE: If a spill occurs, notify the Store Manager, Environmental Protection Specialist, or Environmental Monitor. Initiate the DRMO/Host spill plan. Do not cut or disconnect oil bearing lines.
Environmentally Trained Personnel	14	If informed that oil bearing lines must be cut or disconnected, contact DRMS-DDH and DRMS-LHP for instructions on a case-by-case basis.
	15	Arrange for containers so that each type of subcomponent can be source segregated in accordance with PCB contract line items. Ensure that debris, rags, etc., are kept separate.
	16	Inventory the container's contents to include: Type of material (capacitor, rags, transformers, oil, etc.) Weight. Quantity. Accumulation start date.
	17	Stop placing additional items in the containers within 30 days of the accumulation start date. Fill all air spaces/gaps with absorbent to add stability to the contents and to absorb any liquid that may have developed. Close the lid, seal with ring clamps, and notify the DRMO COR immediately. ***NOTE:*** There is no time limit for the accumulation of small capacitors in drums. Capacitors may be added to drums until the drums are full. However, the drums must be disposed of within 1 year of the accumulation start date. "Small capacitor means a capacitor which contains less that three pounds of dielectric fluid (40 CFR Part 761.3)."
	18	If necessary, move the drum to the designated storage area. TSCA compliant storage is not required for small capacitors removed from electronic equipment (or for any other items not regulated by TSCA for disposal).
	19	Process the drum IAW DRMS-I 4160.14, Voume IV.

	20	Place the drum on a delivery order request in BOSS, for ultimate disposal. If the minimum quantity for PCB, as listed on the PCB requirements contract, is met, enter the following justification on the delivery order: "IAW 40 CFR Part 761.65(a), this item must be disposed of by (1 year from date on drum) in order to remain in compliance with TSCA (or state regulations, when applicable)."